

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION**

JAMESINA CRAWFORD, *et al.*,

Plaintiffs,

vs.

**NEWPORT NEWS INDUSTRIAL
CORPORATION,**

Defendant.

Case No. 4:14-cv-00130-AWA-RJK

JURY TRIAL DEMANDED

Judge Arenda Wright Allen

**PROPOSED AMENDED SCHEDULING
ORDER**

1. October 14, 2020 – November 25, 2020, Trial

- (a) October 12, 2020: each party shall deliver to the Court a binder of original exhibits, properly tabbed, numbered and indexed, plus two binders containing a full set of copies. Photographs may substituted for any non-documentary exhibits.
- (b) 7 days before Trial: File Proposed Jury Instructions; Proposed Voir Dire
- (c) 14 days before Trial:
 - Parties to confer regarding anticipated order and timing of witnesses.
 - Each party will submit to the other side a binder containing its exhibits, properly tabbed, numbered and indexed. Photographs may substituted for any non-documentary exhibits.
 - Each party shall file a summary of outstanding unresolved issues that may impact their presentation of witnesses or exhibits. General relevance/Fed.R.Evid.403 objections need not be summarized except to the extent a ruling is needed prior to trial. No party shall be precluded from raising issues before or during trial that were not included in the summary
- (d) 21 days before Trial: Each party may file Trial Memorandum (if any), and shall file its Proposed Verdict Form

2. **Last week of August 2020¹: Targeted Date for Final Pretrial Conference (“FPTC”)**
 - (a) 7 days before FPTC: Deliver exhibits and deposition transcripts to which there are objections to chambers; Circulate comments on outline for verdict form/format and discuss at FPTC.
 - (b) 14 days before FPTC: Circulate among counsel draft outline for verdict form/format; Circulate Pretrial Order, to include:
 - Stipulated Facts
 - Stipulated Exhibits
 - Exhibits Subject to Objections
 - Plaintiffs’ Witnesses
 - Defendant’s Witnesses
 - Witnesses Subject to Objections
 - Plaintiffs’ Contentions
 - Defendant’s Contentions
 - Triable Issues
3. **Attorney Conference in July and/or August to Occur as Agreed By The Parties.**
 - (a) Including conferral on factual stipulations, Motions in Limine topics, witness and exhibit lists, deposition designations, jury instructions, verdict form, etc. This conference may take place over the course of several days.
4. **14 days before FPTC**: File deposition designations, counter-designations, and rebuttal designations and objections; file witness and exhibit lists and objections.
5. **21 days before FPTC**: File Motion in Limine Replies.
6. **30 days prior to FPTC**: Circulate objections to Witness list, Exhibit list, and Deposition Designations; circulate final rebuttal deposition designations; circulate Defendant’s response to Plaintiff’s proposed factual stipulations and counter-proposals; File Opposition to Motions in Limine.
7. **45 days prior to FPTC**: File Motions in Limine; and circulate deposition Counter-Designations.
 - (a) The parties will make a good faith effort to discuss motion in limine topics before filing to determine whether a motion can be avoided.
8. **60 days before FPTC**: Witness and Exhibit List Designations; Deposition Designations.

¹ If that week is not available for the Court, the parties request a date during the first week of September, if possible.

(a) The parties agree to provide bates number references for all exhibits not previously provided and, if the documents have not been produced, to provide copies or photographs of the exhibits with the exhibit list.

9. August 14, 2020, Target Date for call with Judge Allen to discuss issues related to trial procedure and jury selection.

- (a) Size of jury pool, given length of trial and potential for conflicts
- (b) Potential use of juror questionnaires to streamline Voir Dire
- (c) Daily/weekly trial schedule
 - o For example, will trial run continuously (5 full days per week)?
 - o Keeping trial on schedule, in general
 - o Time limits on any aspects of trial
- (d) Preferences regarding introduction of exhibits
- (e) Discussions to streamline presentation of witnesses and evidence

10. July 10, 2020: Parties to update addresses, and identify witnesses for whom they can accept subpoenas or produce at trial, as well as provide update as to any witness whom they have become aware is no longer in subpoena range and/or no longer works for Defendant.

11. May 15, 2020, Or Later If Agreed By The Parties: Supplemental Discovery Responses and Disclosures Due.

12. April 1, 2020: Deadline to contact the Court if the parties cannot agree as to the scope of supplemental discovery required.

13. Deadlines not involving filings may be amended informally if agreed by the parties without submitting a consent motion or request to alter the instant Scheduling Order.

SO ORDERED.

Dated: _____

Arenda Wright Allen
United States District Court Judge

WE ASK FOR THIS:

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